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December 20, 2016

**BY ECF**

Honorable Edgardo Ramos  
United States District Judge  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: Luis Vazquez v. City of New York, et al.  
15-CV-8270 (ER)

Your Honor:

I am an Assistant Corporation Counsel in the Office of Zachary W. Carter, Corporation Counsel of the City of New York, and the attorney assigned to represent the Defendants in the above-referenced matter. Defendants write respectfully to request a two week extension of time from today, December 20, 2016, to January 3, 2016 to produce electronic discovery. Plaintiff's attorneys, Baree Fett and Gabriel Harvis, could not be reached for their consent.

At the conference held on October 21, 2016, Your Honor ordered Defendants to produce electronic discovery by today, December 20, 2016, consisting of relevant email communications sent by or to Defendants Carolyn Saunders, Tonya Hayes, and Abdur Muhammad relating to the underlying incident. The parties coordinated and agreed upon search terms that would be used to narrow the universe of emails for these custodians to potentially relevant emails for the time period surrounding the date of the incident. To date, all email communications for these custodians have been pulled and compiled into a document review database and the agreed-upon search terms have been applied. The undersigned is currently in the process of reviewing the remaining documents for relevance and privilege. An additional two weeks will enable the undersigned to complete this process and produce any relevant, non-privileged documents to Plaintiff.

Accordingly, Defendants request an extension of time until January 3, 2016 to produce any electronic documents. Thank you for your consideration of this request.

Respectfully submitted,

/s/

Ariel Lichterman  
Assistant Corporation Counsel

cc: Baree Fett, Esq. (by ECF)  
Gabriel Harvis, Esq.